

Exhibit 8

Declaration of Lauren Halverson,
Representative of OUTlaws Student Organization

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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT, DISTRICT OF MONTANA
BUTTE DIVISION**

THE IMPERIAL SOVEREIGN COURT
OF THE STATE OF MONTANA; ADRIA
JAWORT; RACHEL CORCORAN; THE
MONTANA BOOK COMPANY; IMAGINE
BREWING COMPANY, LLC d/b/a
IMAGINE NATION BREWING
COMPANY; BUMBLEBEE AERIAL
FITNESS; MONTANA PRIDE; THE
WESTERN MONTANA COMMUNITY
CENTER; THE GREAT FALLS LGBTQ+
CENTER; THE ROXY THEATER; and
THE MYRNA LOY,

Plaintiffs,

vs.

AUSTIN KNUDSEN; ELSIE ARNTZEN;
J.P. GALLAGHER; and the CITY OF
HELENA,

Defendants.

Cause No. CV 23-50-BU-
BMM

**Declaration of Lauren
Halverson, Member of
OUTlaws at the Alexander
Blewett III School of Law**

I, Lauren Halverson, declare as follows:

1. I am a law student at the Alexander Blewett III School of Law at the University of Montana.
2. I will begin my 2L year this upcoming fall.
3. I hope to work as a public interest attorney in housing law after receiving my Juris Doctor Degree.
4. I am a member, and nominee for vice-president, of OUTlaws—a student organization at the Alexander Blewett III School of Law.
5. OUTlaws is committed to advancing the legal rights of the LGBTQ+ community.
6. OUTlaws receives funding from the law school to carry out its programming.
7. During the fall semester, OUTlaws hosts an annual “Drag Karaoke Gong Show” to help raise funds for other Montana organizations that support LGBTQ+ issues.
8. The Drag Karaoke Gong Show is open to all persons at the Alexander Blewett III School of Law and their families.
9. OUTlaws hires drag performers to judge and perform at the Drag Karaoke Gong Show.

10. The Drag Karaoke Gong Show consists of performances by students, drag performers, and one professor selected by the student body.
11. The performances typically involve karaoke and dancing, and performers have and will, at times, simulate or actually remove outer layers of clothing.
12. Some performers have and will, at times, create the appearance of breasts using artificial material.
13. It appears that the Drag Karaoke Gong Show would be considered a “sexually oriented performance” under HB 359.
14. In 2022, the Drag Karaoke Gong Show was performed at the Ole Beck VFW Post 209.
15. The Ole Beck VFW Post 209 has received state funds through the Paycheck Protection Program and apparently is prohibited from hosting the Drag Karaoke Gong Show under HB 359.
16. HB 359 also appears to classify the Ole Beck VFW Post 209 as a sexually oriented business if it hosts the Drag Karaoke Gong Show, given that it is a bar which serves alcohol.

17. It is unclear whether HB 359 applies retroactively to businesses that have hosted the Drag Karaoke Gong Show in the past.
18. OUTlaws is uncertain where to schedule the Drag Karaoke Gong Show in 2023, as it appears that any business or on-campus location may violate HB 359 by hosting it.
19. OUTlaws is concerned about HB 359's effect on education in Montana, given that the law appears intent on keeping queer people out of education and the lives of children.
20. OUTlaws is concerned for the many transgender and non-binary people subject to the sweeping definitions in HB 359.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 17th day of July, 2023.

DocuSigned by:

/s/ _____
Lauren Halverson
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